

C. Genevieve Jenkins (SBN 271128)  
cgjenkins@excelsislaw.com  
Zainah Alfi (SBN 304164)  
zalfi@excelsislaw.com  
EXCELSIS LAW, P.C.  
4405 Riverside Drive, Ste 206  
Los Angeles, CA 91505  
Telephone: 213-340-0300  
Facsimile: 213-340-0200

Attorneys for Plaintiff  
TAMARA GEIST

James T. Conley (SBN 224174)  
james.conley@ogletree.com  
Michele J. Bongiovanni (SBN 309884)  
michele.bongiovanni@ogletree.com  
Sandra Benlevy (SBN 211568)  
sandra.benlevy@ogletree.com  
OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
400 Capitol Mall, Suite 2800  
Sacramento, CA 95814  
Telephone: 916-840-3150  
Facsimile: 916-840-3159

Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

TAMARA GEIST, an individual,

Plaintiff,

vs.

WAL-MART ASSOCIATES, INC., a Delaware  
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:24-cv-01298-TLN-AC

**JOINT STIPULATION AND ORDER TO  
CONTINUE PRETRIAL DATES**

Action Filed:  
Trial Date:

May 6, 2024  
None Set

1 Plaintiff TAMARA GEIST (“Plaintiff”) and Defendant WAL-MART ASSOCIATES, INC.  
2 (“Defendant”), by and through their counsel, hereby stipulate and agree as follows:

3 WHEREAS, the Parties’ deadline to complete fact discovery is August 4, 2025;

4 WHEREAS, Plaintiff conducted a Rule 30(b)(6) deposition on July 23, 2025;

5 WHEREAS, the Parties are continuing to meet and confer on several topics where further  
6 information is requested by Plaintiff;

7 WHEREAS, Defendant has not yet received medical records subpoenaed from Plaintiff’s  
8 healthcare providers and has not had the opportunity to evaluate whether Plaintiff’s healthcare  
9 provider depositions are necessary;

10 WHEREAS, the Parties are making this request as soon as reasonably practicable once the  
11 Parties realized the necessity of the extension based on productive meet and confer efforts regarding  
12 Plaintiff’s request for further information following Defendant’s Rule 30(b)(6) deposition and  
13 Defendant’s need to review Plaintiff’s medical records and potentially depose Plaintiff’s healthcare  
14 provider(s);

15 WHEREAS, both Parties will suffer significant prejudice if the fact discovery deadline is  
16 not extended for the limited purposes outlined above;

17 WHEREAS, the Parties agree that neither Party will suffer any prejudice if the Court  
18 extends the fact discovery deadline for the limited purposes outlined above;

19 WHEREAS, the Parties agree that the interests of justice are best served by *an extension of*  
20 *the fact discovery deadline for the limited purposes of Plaintiff’s request for further information*  
21 *following Defendant’s Rule 30(b)(6) deposition and Defendant’s review of Plaintiff’s medical*  
22 *records and potential deposition(s) of Plaintiff’s healthcare providers;*

23 **THEREFORE**, for the reasons set forth above, good cause exists for an extension of the  
24 August 4, 2025 fact discovery deadline. Subject to the Court’s approval the Parties stipulate and  
25 agree to the proposed revised deadlines below:

26 ///

27 ///

28 ///

Event	Current Date	Proposed Date
Fact Discovery Cutoff for the Sole Purpose of meeting and conferring on the Rule 30(b)(6) Deposition of Walmart and Defendant obtaining medical records and potentially deposing Plaintiff's healthcare providers.	August 4, 2025	September 2, 2025

**IT IS SO STIPULATED.**

DATED: August 4, 2025

EXCELSIS LAW, P.C.

By: /s/ Zainah Alfi  
C. Genevieve Jenkins  
Zainah Alfi

Attorneys for Plaintiff  
TAMARA GEIST

DATED: August 4, 2025

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Michele J. Bongiovanni  
James T. Conley  
Michele J. Bongiovanni  
Sandra Benlevy

Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.

**SIGNATURE ATTESTATION**

I attest that I have obtained concurrence in the filing of this document from the other signatories in compliance with Local Rule 131(e).

Date: August 4, 2025

By: /s/ Michele J. Bongiovanni  
Michele J. Bongiovanni

**ORDER**


The Court having read and considered the Parties' Joint Stipulation to Continue Pretrial Dates, and good cause appearing:

IT IS HEREBY ORDERED that the pretrial dates shall be as follows:

Event	Current Date	Proposed Date
Fact Discovery Cutoff for the Sole Purpose of meeting and conferring on the Rule 30(b)(6) Deposition of Walmart and Defendant obtaining medical records potentially deposing Plaintiff's healthcare providers.	August 4, 2025	September 2, 2025

**IT IS SO ORDERED.**

Dated: August 5, 2025

  
\_\_\_\_\_  
Troy L. Nunley  
Chief United States District Judge